

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CIRBA INC. (d/b/a DENSIFY)
and CIRBA IP, INC.,

*Plaintiffs and Counter-
Defendants,*

v.

VMWARE, INC.,

*Defendant and Counter-
Plaintiff.*

C.A. No. 19-742-LPS

(CONSOLIDATED)

[PROPOSED] ORDER

At Wilmington this ____ day of _____, 2021, the Special Master having considered VMware's Motion to Compel and the papers submitted in connection therewith,

IT IS HEREBY ORDERED that, no later than December 17, 2021, Cirba Inc. (d/b/a Densify) and Cirba IP, Inc. (collectively, "Cirba") and Brett Slaney shall produce discovery and privilege logs regarding VMware's inequitable conduct and unclean hands defenses, including:

1. Producing all responsive documents in compliance with the full scope of VMware's Request for Production No. 215;
2. Providing a complete, narrative response to VMware's Interrogatory No. 36;
3. Producing all responsive documents in compliance with the full scope of VMware's subpoena to Mr. Slaney;
4. Making Mr. Slaney available for deposition; and
5. Producing privilege logs identifying all responsive inequitable conduct information that Cirba withholds on the basis of a privilege or immunity.

IT IS FURTHER ORDERED that, no later than December 17, 2021, Cirba shall run the disputed ESI terms (VMware's modified term Nos. 1-7 and 12-13 and new term Nos. 1, 2, 4-8 in VMware Letter Ex. 12) and produce all documents responsive to VMware's Request for

Production Nos. 175-178, 180-182, 184-187, 189-197, 201-206, and 208-211.

IT IS HEREBY ORDERED.

John Shaw
Special Master